

REMARKS

Claims 1, 3-13, 16 and 18-28 are pending in this application. By this Amendment, claims 1, 9, 10, 13, 16, 22 and 25 are amended. The amendments introduce no new matter. Reconsideration of the application based on the above amendments and the following remarks is respectfully requested.

Applicants appreciate the courtesies shown to Applicants' representative by Examiner Paula in the August 21, 2007 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

The Office Action rejects claims 1, 3-13, 16 and 18-28 under 35 U.S.C. §102(e) over U.S. Patent No. 6,633,314 to Tuli. This rejection is respectfully traversed.

Tuli discloses a system of dividing an image into sections for the purpose of display priority on a user's display (see col. 2, lines 56-64 of Tuli). Information of individual partial images may then be sequentially decompressed and displayed, as when the user scrolls up, down, or sideways to these parts of the image, so that parts of the image that are not immediately displayed are received and decoded in sequence of priority of which image the user may want to see next (see col. 3, lines 4-16 of Tuli).

However, Tuli does not teach, nor can it reasonably be considered to have suggested, distilling an intermediate data structure for redisplay by converting the intermediate data structure into a format usable for an arbitrarily sized display, wherein the intermediate data structure is automatically adaptable at the time of display to constraints of any display device or circumstance of viewing. Rather, any allegedly corresponding intermediate data structure in Tuli is not "automatically adaptable at the time of display" as used in the context of the pending claims, or as would be understood by one of ordinary skill in the art. In other words, the partial images 7-10, depicted in Tuli, maintain their image characteristics and merely

allow the system to prioritize decompression, rather than adapt any of these individual partial images.

Without conceding the interpretation or application of the applied reference, and solely to advance prosecution of this application, independent claims 1 and 16 are amended to clarify relevant features. For example, claim 1 recites, among other features, distilling the intermediate data structure by redisplay by converting the intermediate data structure into a format usable for reflow on an arbitrarily sized display. Claim 16 recites similar features. As indicated above, Tuli does not teach, nor can it reasonably be considered to have suggested, adapting the partial images 7-10, and certainly not converting any corresponding intermediate data structure into a format useable for reflow on an arbitrary sized display. Limitations of systems, such as those disclosed in Tuli, are discussed, for example, in paragraph [0002] of Applicants' specification as filed. Support for the amended features in claims 1 and 16 can be found, for example, in paragraphs [0005]-[0008] of Applicants' specification as filed, and paragraphs [0005], [0007] and [0008] of Applicants' March 20, 2007 Declaration, and Exhibits B(1)-B(4) and C(1)-C(3) thereof.

These arguments were discussed during the August 21, 2007 personal interview with the Examiner. The Examiner agreed that Tuli does not appear to disclose such features, pending further review.

For at least the above reasons, the applied reference does not teach, nor can it reasonably be considered to have suggested, the combinations of features positively recited in independent claims 1 and 16. Additionally, claims 3-13 and 18-28 are also neither taught, nor would they have been suggested, by the applied reference for at least the respective dependence of these claims, directly or indirectly, on an allowable base claim, as well as for the separately patentable subject matter that each of these claims recites.

Accordingly, reconsideration and withdrawal of the rejection of claims 1, 3-13, 16 and 18-28 are respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1, 3-13, 16 and 18-28 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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